



Notice of Service of Process

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Transmittal Number: 23684679
Date Processed: 08/26/2021

Primary Contact: Vida Wallace Henry
Trane Technologies
800 Beatty St
Ste E
Davidson, NC 28036-6924

Electronic copy provided to: Jessie Basner

Entity:	Ingersoll-Rand Company Entity ID Number 3580879
Entity Served:	Ingersoll-Rand
Title of Action:	Bankers Standard Insurance Company a/s/o Debra Horvath vs. Ingersoll-Rand
Matter Name/ID:	In Re: Debra Horvath (8199032)
Document(s) Type:	Summons/Complaint
Nature of Action:	Product Liability
Court/Agency:	Cook County Circuit Court, IL
Case/Reference No:	2021L007166
Jurisdiction Served:	Illinois
Date Served on CSC:	08/25/2021
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Jonathan M. Heilman 312-831-1090

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

2120 - Served	2121 - Served	2620 - Sec. of State
2220 - Not Served	2221 - Not Served	2621 - Alias Sec of State
2320 - Served By Mail	2321 - Served By Mail	
2420 - Served By Publication	2421 - Served By Publication	
Summons - Alias Summons		(03/15/21) CCG 0001 A

Summons - Alias Summons

(03/15/21) CCG 0001 B

E-FILING: E-filing is now mandatory with limited exemptions. To e-File, you must first create an account with an e-Filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider.

If you need additional help or have trouble e-Filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp> or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit www.illinoislegalaid.org.

FEE WAIVER: If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to www.illinoislegalaid.org. You can also ask your local circuit clerk's office for a fee waiver application.

COURT DATE: Your court date will be sent to your e-File email account or the email address you provided to the clerk's office. You can also call or email the clerk's office to request your next court date. You will need to provide your case number OR, if unknown, the name of the Plaintiff or Defendant. For criminal case types, you will also need to provide the Defendant's birthdate.

REMOTE APPEARANCE: You may be able to attend this court date by phone or video conference. This is called a "Remote Appearance". Call the Circuit Clerk at (312) 603-5030 or visit their website at www.cookcountyclerkofcourt.org to find out how to do this.

Contact information for each of the Clerk's Office locations is included with this summons. The Clerk's office is open Mon - Fri, 8:30 am - 4:30 pm, except for court holidays.

To the officer: (Sheriff Service)

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than thirty (30) days after its date.

● Atty. No.: 37922
○ Pro Se 99500

Name: SCHUELER DALLAVO & CASIERI

Atty. for (if applicable):

Bankers Standard Insurance Co. a/s/o Debra Horvath

Address: 233 S. Wacker Dr., Suite 5230

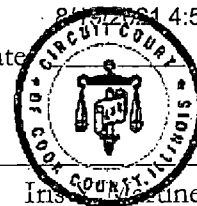
City: Chicago

State: IL Zip: 60606

Telephone: (312)831-1090

Primary Email: jheilman@sdcc-atty.com

Witness date: 8/24/21 4:57 PM IRIS Y. MARTINEZ



Iris Y. Martinez, Clerk of Court

☐ Service by Certified Mail: _____

☐ Date of Service: _____
(To be inserted by officer on copy left with employer or other person)

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

cookcountyclerkofcourt.org

GET YOUR COURT DATE BY CALLING IN OR BY EMAIL

CALL OR SEND AN EMAIL MESSAGE to the telephone number or court date email address below for the appropriate division, district or department to request your next court date. Email your case number, or, if you do not have your case number, email the Plaintiff or Defendant's name for civil case types, or the Defendant's name and birthdate for a criminal case.

CHANCERY DIVISION

Court date EMAIL: ChanCourtDate@cookcountycourt.com

Gen. Info: (312) 603-5133

CIVIL DIVISION

Court date EMAIL: CivCourtDate@cookcountycourt.com

Gen. Info: (312) 603-5116

COUNTY DIVISION

Court date EMAIL: CntyCourtDate@cookcountycourt.com

Gen. Info: (312) 603-5710

**DOMESTIC RELATIONS/CHILD SUPPORT
DIVISION**

Court date EMAIL: DRCourtDate@cookcountycourt.com
OR

ChildSupCourtDate@cookcountycourt.com

Gen. Info: (312) 603-6300

DOMESTIC VIOLENCE

Court date EMAIL: DVCourtDate@cookcountycourt.com

Gen. Info: (312) 325-9500

LAW DIVISION

Court date EMAIL: LawCourtDate@cookcountycourt.com

Gen. Info: (312) 603-5426

PROBATE DIVISION

Court date EMAIL: ProbCourtDate@cookcountycourt.com

Gen. Info: (312) 603-6441

ALL SUBURBAN CASE TYPES

DISTRICT 2 - SKOKIE

Court date EMAIL: D2CourtDate@cookcountycourt.com

Gen. Info: (847) 470-7250

DISTRICT 3 - ROLLING MEADOWS

Court date EMAIL: D3CourtDate@cookcountycourt.com

Gen. Info: (847) 818-3000

DISTRICT 4 - MAYWOOD

Court date EMAIL: D4CourtDate@cookcountycourt.com

Gen. Info: (708) 865-6040

DISTRICT 5 - BRIDGEVIEW

Court date EMAIL: D5CourtDate@cookcountycourt.com

Gen. Info: (708) 974-6500

DISTRICT 6 - MARKHAM

Court date EMAIL: D6CourtDate@cookcountycourt.com

Gen. Info: (708) 232-4551

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

cookcountyclerkofcourt.org

FILED
7/14/2021 4:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL

14043032

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

BANKERS STANDARD INSURANCE
COMPANY A/S/O DEBRA HORVATH

Plaintiff,

v.

INGERSOLL-RAND

Defendant.

File No.: 2021L007166

COMPLAINT AT LAW

NOW COMES the Plaintiff, BANKERS STANDARD INSURANCE COMPANY a/s/o DEBRA HORVATH, by and through its attorneys, SCHUELER, DALLAVO & CASIERI, and complaining of the Defendant, INGERSOLL-RAND, states as follows:

GENERAL ALLEGATIONS

1. Plaintiff, BANKERS STANDARD INSURANCE COMPANY (“Bankers”), is a Pennsylvania corporation with its principal place of business located at 436 Walnut Street, Philadelphia, Pennsylvania 19106.
2. Bankers was at all times herein mentioned authorized to issue policies of insurance in the state of Illinois.
3. DEBRA HORVATH (“Horvath”) is and was at all times herein mentioned the named insured on a policy of insurance (Number 77146957) (the “subject policy”) issued by Bankers.
4. At all relevant times, the Horvath owned and resided at 1410 Silo Ridge Road E Orland Park, IL 60467 (the “residence”).

5. Defendant, INGERSOLL-RAND (“IR”) is a New Jersey Corporation with its principal office located at 800-E Beaty Street Davidson, NC, 28036.

6. At all relevant times, Defendant IR was in the business of manufacturing compressed air, pumps, heating, ventilating, air conditioning, temperature control, and fluid handling equipment.

7. Some time prior to July 20, 2017, an air conditioning unit relay manufactured by IR.

8. On or about July 20, 2017, an air conditioning unit containing a unit relay manufactured by IR leaked at the residence.

9. At all relevant times, Horvath used the air conditioning unit for its intended purpose.

10. On or about July 20, 2017, the residence was damaged with water as a result of the leaking air conditioning unit (“the Leak”).

11. As a result of the leak, Plaintiff Bankers, pursuant to its policy with Horvath, was required to and did pay for the cost of reasonable repairs to the premises and replacement of personal property in the amount of \$152,124.36.

12. Plaintiff Bankers, after its payment to Horvath pursuant to its policy, thereby became subrogated to all of Horvath’s rights, and is entitled to enforce all of the Horvath’s remedies against Defendant IR.

COUNT I – PRODUCT LIABILITY
INGERSOLL-RAND

13. Plaintiff Bankers re-incorporates the allegations contained in paragraphs 1-12 as if fully set forth herein.

14. Defendant IR is in the business of manufacturing compressed air, pumps, heating, ventilating, air conditioning, temperature control, and fluid handling equipment.

15. The design, manufacture and/or modification, sale, and distribution of the unit relay made it defective and not reasonably safe for its intended use.

16. These defects existed at the time the unit relay left IR's factory and entered the stream of commerce for sale to consumers.

17. As a direct and proximate result of this defect, the unit relay manufactured by IR began leaking at the premises.

18. As a result of this leak, Horvath sustained substantial water damage to the premises and her personal property.

WHEREFORE, Plaintiff, BANKERS STANDARD INSURANCE COMPANY A/S/O DEBRA HORVATH, requests judgment in its favor and against Defendant, INGERSOLL-RAND in the amount of \$152,124.36.

COUNT II- NEGLIGENCE
INGERSOLL-RAND

19. Plaintiff Bankers re-incorporates the allegations contained in paragraphs 1-12 as if fully set forth herein.

20. Defendant IR owed a duty to all consumers of their products to manufacture and sell unit relay that were free from defects, and safe for use.

21. Notwithstanding the aforementioned duty, Defendant IR was negligent in committing one or more of the following acts or omissions:

- a. Failed to adequately inspect unit relays for defects before they entered into the stream of commerce;

- b. Failed to properly operate its manufacturing equipment such that its unit relays were manufactured defectively;
- c. Failed to properly train its employees in the proper manufacture of its equipment, such that it manufactured defective unit relays;
- d. Failing to manufacture its unit relays with materials that could withstand normal use;
- e. Manufactured its unit relays with materials not suited for the unit relay's intended use;
- f. Was otherwise careless or negligent.

22. As a direct result of one or more of the aforementioned negligent acts or omissions, the unit relay manufactured by IR began leaking at the premises


23. As a result of this leak, Horvath sustained substantial water damage to the premises and her personal property.

WHEREFORE, Plaintiff, BANKERS STANDARD INSURANCE COMPANY A/S/O DEBRA HORVATH, requests judgment in its favor and against Defendant, INGERSOLL-RAND in the amount of \$152,124.36.

Respectfully submitted:

SCHUELER, DALLAVO & CASIERI

BY:


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